

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

MICHELLE ROBINSON

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Criminal No. 08-10309-MLW

**JOINT RESPONSE TO
COURT'S APRIL 22, 2009 ORDER**

Pursuant to the Court's April 22, 2009 Order, the United States of America and the defendant Michelle Robinson hereby report as to whether the parties have agreed to propose jointly a resolution to this matter.

The defendant Michelle Robinson ("Robinson") may contest elements of the violation contained in the United States Probation's April 15, 2009 Petition ("Petition"), in particular the duration of the time in which she was unsupervised. Accordingly, the government will have witnesses available for the hearing now scheduled for May 1, 2009 should the Court require testimony.

In the event the Court finds that Robinson committed the violation in the Petition, it is the position of the United States Probation Office that the special condition of Robinson's supervised release providing that she serve the first six months of supervised release under home detention be modified to require that she serve the remaining period of this time (*i.e.*, until August 24, 2009) in a community confinement facility. Robinson would like to reserve her right to argue for a different resolution to the Court at the hearing now scheduled for May 1, 2009.

Respectfully submitted,

MICHAEL K. LOUCKS
Acting United States Attorney

By: /s/ Mark Smith
Mark Smith, Esq.
Counsel to Michelle Robinson

By: /s/ James P. Dowden
JAMES P. DOWDEN
Assistant U.S. Attorney

Dated: April 29, 2009